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JUN 21 1993

June 18, 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Office of the Secretary
ATT: Ms. Donna Searcy
Federal Communications Commission
1919 M Street, NW
RM. 222
Washington, DC 20554

92-100

JUN 21 1993

Subject: Comments Regarding GEN Docket 90-314 FCC MAIL DELIVERY

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of:
Amendment of the Commission's
Rules to Establish New Personal
Communications Services

) GEN. Docket 90-3
) ET Docket 92-100
)

JUN 21 1993
FCC MAIL BRANCH

**Comments of Pacific Communication Sciences, Inc.
on the
WINForum Spectrum Etiquette for Unlicensed PCS**

Pacific Communication Sciences, Inc. (PCSI) is pleased to comment on the above captioned submission from the Wireless Information Networks Forum (WINForum) for an unlicensed allocation spectrum etiquette. As a worldwide provider of highly advanced communication technologies, such as digital signal processing and microwave integrated circuits, PCSI believes it can assist the Federal Communications Commission (FCC or Commission) by providing its perspective on this issue, which is so relevant to the introduction of unlicensed personal communications services (PCS).

A Variety of Technical Approaches Will Enhance The PCS Offerings

PCSI would like to reiterate its position¹ that the Commission will gravely error if it adopts any conditions or regulations that preclude the implementation of a wide variety of radio-based technologies. Wireless communications are a worldwide industry, with many U.S. companies having domestic and international activities. Furthermore, significant international efforts have already been completed that can be leveraged to provide American consumers and businesses with high quality, low cost wireless communications. The FCC actions regarding technical considerations for PCS will impact American companies' PCS competitiveness on an international scale and the affordability of domestic products and services.

The communications market is becoming increasingly more sophisticated in its applications, requirements and expectations. Gone are the days of single source providers and second rate quality. For the unlicensed PCS applications to be successful and pervasive, high quality and reliability are essential. The WINForum etiquette is an attempt at providing a sensible environment for a broad category of products, both voice and data. PCSI applauds WINForum's efforts for attempting to assure that chaos does not reign

¹ Comments of Pacific Communication Sciences, Inc., GEN Docket No. 90-314, ET Docket 92-100, Nov. 9, 1992.

supreme in a segment of PCS that is vitally important to the country's business community and general population. The unlicensed band will allow companies to introduce innovative products, enhance corporate communications and provide better services to customers.

The etiquette attempts to provide fair access to, and nonabusive use of, the allocation. WINForum identifies several areas of the etiquette where additional work is needed². Until these and possibly other items are finalized, it is premature to accept the position that the etiquette does not bias one technical approach at the expense of others. PCSI has so far identified the following concerns about the proposed etiquette that would have to be addressed before PCSI would endorse the etiquette.

First, the proposed channelization of the isochronous band is unfair to technologies using more than 1.25 MHz bandwidth. (Reference etiquette paragraph 3.4.) Examples of such technologies include DECT and wideband CDMA, which are major candidates for PCS systems. PCSI reaffirms its position, stated earlier to the Commission, that any rule for the PCS bands should allow the greatest possible diversity of usage among competitive technologies.

² Motion to Accept Late Filed Submission, The Wireless Information Networks Forum, GEN Docket No. 90-314, ET Docket 92-100, May 17, 1993, e.g., pg. 5 Sec. 3.5.

Second, the isochronous band etiquette does not adequately address the access methods for technologies that occupy less than 1.25 MHz. (Reference etiquette paragraph 3.5.) At the least, the etiquette should provide a clearer method for ensuring that wideband and narrowband methods can detect each other during the LBT (listen-before-talk) process. The allowed methods of subdividing the 1.25 MHz bands should also be clarified.

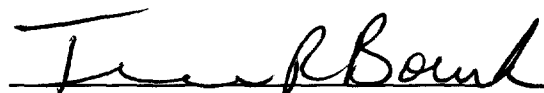
Third, the etiquette may be unfair to technologies that use fixed control channel frequencies. Some technologies, such as Personal Handy Phone (PHP), could be adapted to use the asynchronous band for control signals, and the isochronous band for traffic, but it is not clear that such usage would be consistent with the proposed etiquette. The contents of etiquette paragraphs 3.6.1 and 3.6.2 may be intended to address this issue. PCSI feels that these sections should be completed, and the control channel issue must be addressed, before the etiquette is approved.

Conclusion

The term "A level playing field" has been used throughout these proceedings. As the Commission gets closer to ruling on this very important subject it needs to maintain an atmosphere of fairness to the diverse nature of the service and product providers, their constituents and the eventual

end-users. The FCC should actively contribute to finalizing these rules. Without the Commission's guidance, unlicensed PCS will remain only a vision.

Respectfully Submitted:

A handwritten signature in dark ink, appearing to read "Terrance R. Bourk". The signature is fluid and cursive, with a horizontal line drawn underneath the name.

Terrance R. Bourk
Vice President

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